



Joseph E. Kernan
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100 North Senate Avenue
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(317) 232-8603
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NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a Part 70 Permit

for Weiss Prestaining, Inc. in LaPorte County

Significant Permit Modification No.: 091-19505-00069

The Indiana Department of Environmental Management (IDEM), has received an application from Weiss Prestaining, Inc., located at 3522 South SR 104, LaPorte, Indiana for a Significant Modification to their Part 70 Permit issued on September 28, 1998. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Weiss Prestaining, Inc. to make certain changes at their existing source. Weiss Prestaining, Inc. has applied to operate a vinyl trim spray paint booth, identified as Unit 7. If operated 365 days a year, 24 hours a day, 7 days a week, the proposed spray paint booth could potentially release 4.87 tons of PM, 4.87 tons of PM₁₀, 8.56 tons of VOC, and 3.93 tons of total HAPs per year. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

LaPorte County Public Library
904 Indiana Ave.
LaPorte, IN 46350-3407

And

Northwest Regional Office
8315 Virginia Avenue
Suite 1
Merrillville, IN 46410-9201

A copy of the preliminary findings is available on the Internet at:

www.IN.gov/idem/air/permits/Air-Permits-Online.

How can you participate in this process?

The day after this announcement is published in a newspaper marks the beginning of a 30-day public comment period. During that 30-day period, you may comment on this draft permit. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM may hold a public hearing. If a public hearing is held, IDEM will make a separate announcement of the date, time, and location of that hearing. At a hearing, you would have an opportunity to submit written comments, make verbal comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM. If you do not want to comment at this time, but would like to be added to IDEM's mailing list to receive notice of future action related to this permit application, please contact IDEM. Please refer to permit number SPM 091-19505-00069 in all correspondence.

To Contact IDEM:

Michael S. Schaffer
IDEM, Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(800) 451-6027, ask for extension (631) 691-3395
Or dial directly: (631) 691-3395 extension 23
E-mail: mschaffer@mesamity.com

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate, Indianapolis and 8315 Virginia Avenue, Suite 1, Merrillville.

If you have any questions please contact Michael S. Schaffer of my staff at the above address.

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: www.IN.gov/idem/guides.

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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Weiss Prestaining, Inc.
3522 South SR 104
LaPorte, Indiana 46350

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 091-7626-00069	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Quality	Issuance Date: September 28, 1998 Expiration Date: September 28, 2003

First Significant Permit Modification No.: 091-11522-00069, issued on March 30, 2000

First Reopening No.: 091-13381-00069, issued on January 3, 2002

First Administrative Amendment No.: 091-19393-00069, issued on August 10, 2004

Second Significant Permit Modification No.: 091-19505-00069	
Pages Affected: 3, 3a, 4, 4a, 8, 16, and 21 - 24 Pages Added: 24a and 27d - 27g	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

DRAFT

- C.10 Compliance Schedule [326 IAC 2-7-6(3)]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Monitoring Methods [326 IAC 3] [

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-7-5] [326 IAC 2-7-6]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]
- C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS: Surface Coating Operations..... 25

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Volatile Organic Compounds [326 IAC 8-1-6]
- D.1.2 Special Conditions

Compliance Determination Requirements

- D.1.3 Volatile Organic Compounds (VOC)
- D.1.4 VOC Emissions

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.10 Record Keeping Requirements
- D.1.11 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS: Insignificant Welding 27

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Compliance Determination Requirements

- D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.3 FACILITY OPERATION CONDITION: Machines 5 and 6 27a

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.3.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.3.2 Volatile Organic Compounds and VHAPs [326 IAC 8-1-6] [326 IAC 2-1-3.4]

Compliance Determination Requirements

- D.3.3 Testing Requirements [326 IAC 2-7-6(1)][326 IAC 2-1.1-11]
- D.3.4 Volatile Organic Compounds (VOC) and VHAPs
- D.3.5 VOC Emissions

DRAFT

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.6 Record Keeping Requirements

D.3.7 Reporting Requirements

D.4 FACILITY OPERATION CONDITIONS: Plastic Products Surface Coating Booth 27d

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501]

D.4.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]

D.4.3 Volatile Organic Compounds (VOC), Particulate Matter (PM), and Particulate Matter Less Than Ten Microns (PM10) [326 IAC 2-7-10.5]

D.4.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

D.4.5 Particulate [326 IAC 6-3-2(d)]

D.4.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.4.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.8 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.9 Record Keeping Requirements

D.4.10 Notification Requirements [40 CFR 63.4510]

D.4.11 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

Certification 28

Emergency Occurrence Report 29

Quarterly Report..... 30a

Quarterly Deviation and Compliance Monitoring Report..... 32

DRAFT

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary exterior wood siding surface coating operation.

Responsible Official:	Vice President
Source Address:	3522 South SR 104, LaPorte, IN 46350
Mailing Address:	P.O Box 650, North Liberty, IN 46554
General Source Phone Number:	219-369-9111
SIC Code:	2499
County Location:	LaPorte
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules and Nonattainment NSR; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Four (4) flowcoating machines, identified as Units 1, 2, 3, and 4A, coating wood boards and panels with a combined capacity of 5,833.34 square feet per hour, with Unit 2 exhausting through Stack ID# V-1. One (1) dry room and one (1) dry area with four (4) general ventilation fans, identified as GV-1, GV-2, GV-3, and GV-4, are used to dry the boards. One (1) dip coat bucket, used to coat nails with a capacity of 3.88 pounds per hour, is exhausted to general ventilation.
- (b) One (1) latex/oil based flow coater, known as Machine #5, exhausted to general ventilation fans 1,2,3 and 4, capacity: 7,500 square feet of wood siding panels or boards per hour on latex or 7,000 square feet of wood siding panels or boards per hour on oil.
- (c) One (1) oil based/latex flow coater, known as Machine #6, exhausted to Stack V-1 and to general ventilation fans 1,2, 3 and 4, capacity: 7,000 square feet of wood siding panels or boards per hour on oil or 7,500 square feet of wood siding panels or boards per hour on latex.
- (d) One (1) spray paint booth, identified as Unit 7, to be installed in 2004, equipped with dry filters for particulate control, exhausting to general ventilation (GV), capacity: 410.28 square feet of vinyl trim per hour.

DRAFT

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, which are specifically regulated, as defined in 326 IAC 2-7-1(21).

The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

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- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and the Northwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Office of Air Quality, Compliance Section)
Facsimile No.: 317-233-5967
Northwest Regional Office
Telephone Number: 219-757-0265
Facsimile Number: 219-757-0267

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAQ shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

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C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

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- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3) [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

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- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (f) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (g) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (h) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (i) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available

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upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plastic Products Surface Coating Booth

- (d) One (1) spray paint booth, identified as Unit 7, to be installed in 2004, equipped with dry filters for particulate control, exhausting to general ventilation (GV), capacity: 410.28 square feet of vinyl trim per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1. General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart P] [40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart P. The Permittee must comply with these requirements on and after April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.4.2. National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]

- (a) The provisions of 40 CFR Part 63, Subpart P (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart P:
- (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

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- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

D.4.3 Volatile Organic Compounds (VOC), Particulate Matter (PM), and Particulate Matter Less Than Ten Microns (PM₁₀) [326 IAC 2-7-10.5]

- (a) Any change or modification that increases the potential to emit from the proposed Unit 7 to greater than ten (10) tons of VOC per year shall render the requirements of 326 IAC 2-7-10.5 applicable to Unit 7 and shall require prior IDEM, OAQ approval.
- (b) Any change or modification that increases the potential to emit PM and PM₁₀ before controls from Unit 7 to greater than five (5) tons per year each, shall render the requirements of 326 IAC 2-7-10.5 applicable to Unit 7 and shall require prior IDEM, OAQ approval.

D.4.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from Unit 7 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.4.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating at Unit 7 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.4.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Unit 7 as well as the control device.

Compliance Determination Requirements

D.4.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the emission limitation contained in Condition D.4.3(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

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Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the Unit 7 exhaust while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the Unit 7 exhaust and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.9 Record Keeping Requirements

- (a) To document compliance with Condition D.4.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, PM, and PM₁₀ emission limits established in Condition D.4.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used at Unit 7.
 - (2) The amount of coating material and solvent used at Unit 7 on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC usage for each month; and
 - (4) The total amount of solids delivered to the applicators at Unit 7 each month.
- (b) To document compliance with Condition D.4.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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D.4.10 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

D.4.11 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include Information regarding which compliance option or options will be chosen in the Part 70 permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than July 19, 2006.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Permit Modification

Source Background and Description

Source Name:	Weiss Prestaining, Inc.
Source Location:	3522 South SR 104, LaPorte, Indiana 46350
County:	LaPorte
SIC Code:	2499
Operation Permit No.:	T 091-7626-00069
Operation Permit Issuance Date:	September 28, 1998
Significant Permit Modification No.:	SPM 091-19505-00069
Permit Reviewer:	Michael S. Schaffer

The Office of Air Quality (OAQ) has reviewed a modification application from Weiss Prestaining, Inc. relating to the operation of the following emission unit and pollution control device:

- (d) One (1) spray paint booth, identified as Unit 7, to be installed in 2004, equipped with dry filters for particulate control, exhausting to general ventilation (GV), capacity: 410.28 square feet of vinyl trim per hour.

History

Weiss Prestaining, Inc. was issued a Part 70 Operating Permit on September 28, 1998. On March 30, 2000, Weiss Prestaining, Inc. was issued First Significant Permit Modification 091-11522-00069, which incorporated into the Part 70 Operating Permit the operating conditions, from CP 091-9572-00069, issued on December 1, 1998, for the two (2) latex/oil based flow coaters, identified as Machines #5 and #6. On January 3, 2002, Weiss Prestaining, Inc. was issued Reopening 091-13381-00069 to revise the language in Condition B.11(c)(3) of the Part 70 Operating Permit. On August 10, 2004, Weiss Prestaining, Inc. was issued First Administrative Amendment 091-19393-00069 to change the responsible official listed in Condition A.1 of the Part 70 Operating Permit from "Greg Weiss" to "Vice President."

On August 19, 2004, Weiss Prestaining, Inc. submitted an application to the OAQ requesting to add a spray paint booth to their existing plant. That spray paint booth, which is identified as Unit 7, has an unrestricted potential to emit of less than ten (10) tons of VOC per year as well as less than five (5) tons per year of PM and PM₁₀. Therefore, the addition of Unit 7 is exempt from construction permit requirements pursuant to 326 IAC 2-1.1-3(e)(1). However, since this source is an existing major source of HAPs, the spray paint booth, identified as Unit 7, is subject to the requirements of 40 CFR 63, Subpart PPPP, (NESHAP for the Surface Coating of Plastic Parts and Products). As a result, the addition of Unit 7 is considered a modification under a provision of Title I of the Clean Air Act, and thus, will be permitted to operate when a significant permit modification is issued in accordance with 326 IAC 2-7-12(d).

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

There are no stacks that are associated with this modification.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 19, 2004. Additional information was received on August 26 and 31, 2004.

Emission Calculations

See pages 1 and 2 of 2 in Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.

This table reflects the PTE before controls for this modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	4.87
PM ₁₀	4.87
SO ₂	-
VOC	8.55
CO	-
NO _x	-

HAPs	Potential To Emit (tons/year)
Butoxyethonal	3.93
TOTAL	3.93

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d) because a modification that does not qualify as a Minor Permit Modification under 326 IAC 2-7-12(b) or an Administrative Amendment under 326 IAC 2-7-11, must be performed as a Significant Permit Modification.

Pursuant to 326 IAC 2-7-12(b)(1)(E), this modification cannot be performed as a minor permit modification because the Part 70 Operating Permit is being modified under Title I of the Clean Air Act to incorporate the notification requirements of 40 CFR 63, Subpart PPPP. In addition, the permit cannot be modified as an Administrative Amendment because the addition of the notification requirements of 40 CFR 63, Subpart PPPP is not considered a descriptive change.

An exemption letter will also not be issued because Unit 7 can be constructed at any time. However, the Unit 7 is not permitted to operate until the Significant Permit Modification is issued.

County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	attainment
8-Hour Ozone	nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) LaPorte County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	Less Than 250
PM ₁₀	Less Than 250
SO ₂	Less Than 250
VOC	Greater Than 100
CO	Less Than 250
NO _x	Less Than 100

- (a) This existing source is a major stationary source because a nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year or more.
- (b) These emissions are based upon the emission from the TSD to T 091-7626-00069, issued on September 28, 1998 in combination with the TSD to CP 091-9572-00069, issued on December 1, 1998.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 permit modification.

Pollutant	PM (tons/yr)	PM ₁₀ (tons/yr)	SO ₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO _x (tons/yr)
Proposed Unit 7	0.243	0.243	-	8.55	-	-
Major New Source Review Significant Level	25	15	40	40	100	40

This modification to an existing major stationary source is not major because the emissions increase is less than the Major New Source Review significant levels. Therefore, pursuant to 326 IAC 2-2 and 326 IAC 2-1.1-5, the Major New Source Review requirements do not apply.

Federal Rule Applicability

- (a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC, PM and PM₁₀:
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for VOC, PM and PM₁₀;
 - (2) that is subject to an emission limitation or standard for VOC, PM and PM₁₀; and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) Unit 7, which is the only facility that will be coating plastic at this source, is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart PPPP, pursuant to 40 CFR 63.4481(b), because the entire source is a major source of HAPs, the affected source will be using more than 100 gallons (378 liters) of coatings per year and the coatings that will be used at the affected source do not meet the definition of non-HAP coatings pursuant to 40 CFR 63.4581. Pursuant to 40 CFR 63.4483(c)(1), Unit 7 will be considered an existing affected source since the source has surface coating operations that commenced construction prior to December 4, 2002.

- (1) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR 63, Subpart PPPP. The Permittee must comply with these requirements on and after April 19, 2007.

The website <http://www.epa.gov/ttn/atw/plastic/plasticpg.html> provides a copy of the signed final rule.

- (2) This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a Significant Permit Modification no later than July 19, 2006, that will provide a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart PPPP, the Permittee shall submit:

- (A) The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (B) The Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (C) The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than thirty (30) calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR

63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

326 IAC 2-1.1-5 (Nonattainment New Source Review)

This source is considered an existing major PSD and nonattainment new source review source since the potential to emit VOC from the entire source is greater than one hundred (100) tons per year.

The unrestricted potential to emit from this modification is less than forty (40) tons of VOC, twenty-five (25) tons of PM, and fifteen (15) tons of PM₁₀ per year, respectively.

Therefore, the requirements of Major New Source Review are not applicable to the proposed modification.

326 IAC 2-4.1-1 (New Source Toxics Control)

The construction of Unit 7 is for the purposes of producing new product. However, the unrestricted potential to emit of any single HAP from Unit 7 is less than ten (10) tons per year and the unrestricted potential emit of any combination of HAPs from Unit 7 is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2.4.1-1 do not apply to Unit 7.

326 IAC 2-7-10.5 (Part 70 Source Modification)

- (a) Any change or modification that increases the potential to emit from the proposed Unit 7 to greater than ten (10) tons of VOC per year shall render the requirements of 326 IAC 2-7-10.5 applicable to Unit 7 and shall require prior IDEM, OAQ approval.
- (b) Any change or modification that increases the potential to emit PM and PM₁₀ before controls from Unit 7 to greater than five (5) tons per year each, shall render the requirements of 326 IAC 2-7-10.5 applicable to Unit 7 and shall require prior IDEM, OAQ approval.

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

326 IAC 6-3-2 (Process Operations)

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the Unit 7 shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand

(60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Under the rule revision, particulate from the surface coating at Unit 7 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications

326 IAC 8-1-6 (New facilities; General Reduction Requirements)

The proposed Unit 7 will not be regulated by any other provision of 326 IAC 8 because there are no limitations in the other provisions of 326 IAC 8 that are applicable to the surface coating of vinyl trim. The unrestricted potential to emit of the proposed Unit 7 is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply to this modification.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the Unit 7 exhaust while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the Unit 7 exhaust and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the

Preventive Maintenance Plan.

The dry filters for the Unit 7 must operate properly to ensure compliance with 326 IAC 5-1 (Opacity Limitations), 326 IAC 6-3 (Process Operations), and 326 IAC 2-7 (Part 70).

Testing Requirements

There are no VOC and/or specific PM and PM₁₀ emission rate limitations that are applicable to Unit 7. Therefore, no stack testing requirements will be required in this modification.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

Change 1:

Since this LaPorte has been designated as nonattainment for ozone under the 8-hour standard as of June 15, 2004, the source location status and source status in Condition A.1 will be revised in this modification as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary exterior wood siding surface coating operation.

Responsible Official:	Vice President
Source Address:	3522 South SR 104, LaPorte, IN 46350
Mailing Address:	P.O Box 650, North Liberty, IN 46554
General Source Phone Number:	219-369-9111
SIC Code:	2499
County Location:	LaPorte
Source Location Status:	Nonattainment for ozone under the 8-hour standard
	Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program
	Minor Major Source, under PSD Rules and Nonattainment
	NSR;
	Major Source, Section 112 of the Clean Air Act

Change 2:

The proposed Unit 7 will be added as Condition A.2(d) as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

(d) **One (1) spray paint booth, identified as Unit 7, to be installed in 2004, equipped with dry filters for particulate control, exhausting to general ventilation (GV), capacity: 410.28 square feet of vinyl trim per hour.**

Change 3:

References to the Northwest Regional Office will be added to Condition B.13(b)(4) as follows:

B.13 Emergency Provisions [326 IAC 2-7-16]

- (b) (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ **and the Northwest Regional Office** within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,

Telephone No.: 317-233-5674 (ask for Office of Air Quality, Compliance Section)

Facsimile No.: 317-233-5967

Northwest Regional Office

Telephone Number: 219-757-0265

Facsimile Number: 219-757-0267

Change 4:

The OAQ, Technical Support and Modeling Section listed in Condition B.26(c) should now be the OAQ, Billing, Licensing, and Training Section. Therefore, Condition B.26(c) will be revised as follows:

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-~~0425~~ **4230** (ask for OAQ, ~~Technical Support and Modeling Section~~ **Billing, Licensing, and Training Section**), to determine the appropriate permit fee.

Change 5:

Since Compliance Monitoring Requirements will be required in Section D.4 to ensure the dry filters are properly maintained, the source will be required to submit a Compliance Response Plan to IDEM, OAQ. Therefore, Condition C.15 (Compliance Response Plan - Preparation, Implementation, Records, and Reports) will be added as follows:

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating,

except for time necessary to perform quality assurance and maintenance activities.

Change 6:

As a result of the addition of Condition C.15 in Change 5, all remaining conditions in the Section C will be renumbered. In addition, the following revisions were made to Condition C.16 (now Condition C.17) (Emission Statement Condition) to incorporate the revisions to 326 IAC 2-6 that became effective on March 27, 2004. The revised rule was published in the Indiana Register on April 1, 2004.

C.1617 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) ~~The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~ **Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:**

- (1) Indicate **estimated** actual emissions of ~~criteria~~ **all** pollutants ~~from the source, in compliance with 326 IAC 2-6 (Emission Reporting)~~ **listed in 326 IAC 2-6-4(a);**
- (2) Indicate **estimated** actual emissions of ~~other~~ regulated pollutants **as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule")** from the source, for purposes of Part 70 fee assessment.

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

~~(c)-(b)~~ **The annual** emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

Change 7:

The equipment description box, Emissions Limitations and Standards, Compliance Determination Requirements, Compliance Monitoring Requirements, and Record Keeping and Reporting Requirements for Unit 7 will be added to proposed Section D.4 as follows:

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plastic Products Surface Coating Booth

- (d) One (1) spray paint booth, identified as Unit 7, to be installed in 2004, equipped with dry filters for particulate control, exhausting to general ventilation (GV), capacity: 410.28 square feet of vinyl trim per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1. General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart P] [40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart P. The Permittee must comply with these requirements on and after April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.4.2. National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]

- (a) The provisions of 40 CFR Part 63, Subpart P (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart P:
- (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

D.4.3 Volatile Organic Compounds (VOC), Particulate Matter (PM), and Particulate Matter Less Than Ten Microns (PM₁₀) [326 IAC 2-7-10.5]

- (a) Any change or modification that increases the potential to emit from the proposed Unit 7 to greater than ten (10) tons of VOC per year shall render the requirements of 326 IAC 2-7-10.5 applicable to Unit 7 and shall require prior IDEM, OAQ approval.
- (b) Any change or modification that increases the potential to emit PM and PM₁₀ before controls from Unit 7 to greater than five (5) tons per year each, shall render the requirements of 326 IAC 2-7-10.5 applicable to Unit 7 and shall require prior IDEM, OAQ approval.

D.4.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from Unit 7 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.4.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating at Unit 7 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.4.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Unit 7 as well as the control device.

Compliance Determination Requirements

D.4.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the emission limitation contained in Condition D.4.3(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the Unit 7 exhaust while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the Unit 7 exhaust and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.9 Record Keeping Requirements

- (a) To document compliance with Condition D.4.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, PM, and PM₁₀ emission limits established in Condition D.4.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used at Unit 7.
 - (2) The amount of coating material and solvent used at Unit 7 on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC usage for each month; and
 - (4) The total amount of solids delivered to the applicators at Unit 7 each month.
- (b) To document compliance with Condition D.4.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.10 Notification Requirements [40 CFR 63.4510]

- (a) **General.** The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) **Initial notification.** The Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (c) **Notification of compliance status.** The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

D.4.11 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include Information regarding which compliance option or options will be chosen in the Part 70 permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than July 19, 2006.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Conclusion

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 091-19505-00069.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Weiss Prestaining, Inc.
Address City IN Zip: 3522 South SR 104, LaPorte, Indiana 46350
Permit Number: SPM 091-19505
Plt ID: 091-00069
Reviewer: Michael S.Schaffer
Application Date: August 19, 2004**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non- Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Lb VOC/gal solids	Transfer Efficiency
Unit 7																
<i>Worst Case PM Emitting Coating Combination</i>																
X-1000 Crosslinker	8.91	0.500%	0.00%	0.5%	0.00%	0.00%	0.000045	410.28	0.04	0.04	0.00	0.020	0.004	0.108	N/A	85%
Hydro-Flex Polyurethane	9.66	18.63%	0.00%	18.6%	0.00%	39.20%	0.0022472	410.28	1.80	1.80	1.66	39.8	7.27	4.76	4.59	85%
<i>Worst Case VOC Emitting Coating Combination</i>																
Urethane Crosslinker	8.91	0.000%	0.00%	0.0%	0.00%	100.00%	0.000045	410.28	0.00	0.00	0.00	0.000	0.000	0.108	0.00	85%
Terratone Urethane	9.73	40.57%	18.80%	21.8%	21.96%	69.67%	0.0022472	410.28	2.71	2.12	1.95	46.9	8.55	3.50	3.04	85%
<i>Alternative Coating Combination</i>																
X-1000 Crosslinker	8.91	0.500%	0.00%	0.5%	0.00%	0.00%	0.000045	410.28	0.04	0.04	0.00	0.020	0.004	0.108	N/A	85%
Hydro-Flex PIR (Heat Reflexive) Polyurethane	9.66	20.70%	0.00%	20.7%	0.00%	41.50%	0.0022472	410.28	2.00	2.00	1.84	44.2	8.075	4.64	4.82	85%

All coatings are "as applied" to the applicators

PM Control Efficiency: 95.00%

State Potential Emissions

Add worst case coating to all solvents

Uncontrolled	1.95	46.9	8.55	4.87
Controlled	1.95	46.9	8.55	0.243

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Page 2 of 2 TSD App A

Company Name: Weiss Prestaining, Inc.
Address City IN Zip: 3522 South SR 104, LaPorte, Indiana 46350
Permit Number: SPM 091-19505
Plt ID: 091-00069
Reviewer: Michael S.Schaffer
Application Date: August 19, 2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Butoxyethonal	Butoxyethonal Emissions (ton/yr)
Unit 7					
<i>Worst Case PM Emitting Coating Combination</i>					
X-1000 Crosslinker	8.91	0.000045	410.28	0.00%	0.00
Hydro-Flex Polyurethane	9.66	0.0022472	410.28	5.00%	1.95
<i>Worst Case VOC Emitting Coating Combination</i>					
Urethane Crosslinker	8.91	0.000045	410.28	0.00%	0.00
Terratone Urethane	9.73	0.0022472	410.28	10.00%	3.93
<i>Alternative Coating Combination</i>					
X-1000 Crosslinker	8.91	0.000045	410.28	0.00%	0.00
Hydro-Flex PIR (Heat Reflexive) Polyurethane	9.66	0.0022472	410.28	5.00%	1.95

All coatings are "as applied" to the applicators.

3.93

Total State Potential Emissions - Worst Case Coating

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs